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John Flounlacker, Esquire I.D. No. 73112 Thomas, Thomas & Hafer, LLP 305 N. Front Street P.O. Box 999 Harrisburg, PA 17108-0999 (717)237-7134

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JACK MARRONE, husband, KAREN MARRONE, wife, both individually and in their capacity as parents and guardians for VIDA MARRONE, a minor, and MATTHEW ADAM MARRONE, Plaintiffs

٧.

ALLSTATE INSURANCE COMPANY, LINDA M. EDLEMAN, FRED SCHAFER, MT. GRETNA REALTY, and HOUSEMASTERS Defendants : NO.: 1:CV-01-0773

JUDGE Lan

HARRISBURG

Civil Action Law

MAR 1 4 2002

MARY E. D'ANDREA, CLERK

Jury Trial Demandeರ

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RESPONSE OF DEFENDANT, LINDA M. EDLEMAN, TO THE CROSSCLAIM OF DEFENDANTS, FRED SCHAFER AND MT. GRETNA REALTY

AND NOW ONTO COURT, through undersigned counsel, comes the Defendant, Linda M. Edleman, who, in Answer to the Crossclaim of Defendants, Fred Schafer and Mt. Gretna Realty, respectfully represents that:

15. Answering Defendant submits that the allegations contained in Defendants, Fred Schafer and Mt. Gretna's Crossclaim amounts to legal conclusions which require no Answer. Where an Answer is deemed to be required, after reasonable investigation, Answering Defendant lacks information or knowledge sufficient to form a belief as to the truth of the averments contained in this paragraph and same are therefore denied, strict proof being demanded at trial, if relevant.

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WHEREFORE, Defendant requests Your Honorable Court to deny Plaintiffs the relief requested and to enter judgment in favor of Defendant and against the Plaintiffs.

Respectfully submitted,

THOMAS, THOMAS & HAFER, LLP

By: <u>/U./ JU</u>

John Flounlacker, Esquire Attorney I.D. # 73112

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Date: _____

CERTIFICATE OF SERVICE

I. Jeannie L. Kawalec, an employee for the law firm Thomas, Thomas & Hafer, LLP, hereby state that a true and correct copy of the foregoing document(s) was served upon all counsel of record by first class United States mail, postage prepaid, addressed as follows, on the date set forth below:

By First Class U.S. Mail:

Louis M. Tarasi, Esquire 510 3rd Avenue Pittsburgh, PA 15219

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THOMAS, THOMAS & HAFER, LLP

Dated: 3//3/02